

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 1512-1, 2839-1,  
2938, 2945

**DEBTORS' SUPPLEMENT TO THIRD OMNIBUS MOTION FOR  
APPROVAL OF MODIFICATIONS TO THE AUTOMATIC STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Sales Tax Financing Corporation (“COFINA”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”), as Title III debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management,*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*and Economic Stability Act* (“PROMESA”),<sup>2</sup> respectfully submits this supplement (the “Supplement”) to *Debtors’ Third Omnibus Motion for Approval of Modifications to the Automatic Stay* [ECF No. 2938] (the “Third Omnibus Motion”), pursuant to sections 362(d)(1) and 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these cases by PROMESA section 301(a), and in accordance with Paragraph III.Q of the Case Management Procedures (as defined below), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), retroactively approving the modifications to the automatic stay set forth in Bankruptcy Code sections 362(a) and 922(a) (the “Title III Stay”), (a) for the party and action set forth in **Exhibit 1** to the Proposed Order, *nunc pro tunc* to the date specified therein, and (b) for parties to certain administrative employment and pension actions against debtor ERS as set forth on **Exhibit 2** to the Proposed Order, *nunc pro tunc* to the dates specified therein. In support of this Supplement, the Debtors respectfully represent as follows:

### **Supplement**

1. This Supplement incorporates in full, as if set forth herein, the contents and factual and legal assertions of the Third Omnibus Motion and supplements it as follows.

### **Background**

2. On April 23, 2018, the Court granted the Third Omnibus Motion, which modified the Title III Stay as set forth in the attached exhibits, *nunc pro tunc*, to the dates specified therein [ECF No. 2945].

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

3. ERS and the Commonwealth desire to supplement the Third Omnibus Motion to include modifications that were agreed to during the timeframe covered in such motion and that were inadvertently excluded.

**Relief Requested**

3. By this Supplement, the Debtors seek to supplement the Third Omnibus Motion to include modifications to the stay that were agreed to by the Debtors during the period from February 21, 2018 through April 20, 2018 and that were inadvertently excluded from the Third Omnibus Motion. As required by Paragraph III.Q of the Case Management Procedures, Exhibit 1 to the Proposed Order includes a brief description of the modification of the Title III Stay and case information (including case number and court), as applicable, for each party to a stay modification stipulation previously executed by the indicated Debtor during the period from February 21, 2018 through April 20, 2018 (the date of the Third Omnibus Motion). Further, the Supplement seeks to approve modifications to the Title III Stay agreed to by ERS, through this Supplement and without the need for a stipulation in accordance with Paragraph III.Q of the Case Management Procedures, solely to allow the labor and pension claims detailed on Exhibit 2 to the Proposed Order to continue through judgment but not the execution or enforcement of any judgment

4. Accordingly, the Debtors request that the Court enter an order retroactively approving the modifications of the Title III Stay set forth on Exhibit 1 and 2 to the Proposed Order.

**Notice**

5. The Debtors have provided notice of this Supplement in accordance with the Case Management Procedures to the following parties: (a) the Office of the United States Trustee for

the District of Puerto Rico; (b) the indenture trustees and/or agents, as applicable, for the Debtors' bonds; (c) the entities on the list of creditors holding the 20 largest unsecured claims against COFINA; (d) counsel to the statutory committees appointed in these Title III cases; (e) the Office of the United States Attorney for the District of Puerto Rico; (f) counsel to the Oversight Board; (g) the Puerto Rico Department of Justice; (h) the Other Interested Parties;<sup>3</sup> (i) all parties filing a notice of appearance in these Title III cases; and (j) the parties set forth in Exhibit 1 and 2 to the Proposed Order. A copy of the Supplement is also available on the Debtors' case website at <https://cases.primeclerk.com/puertorico/>.

6. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Motion**

7. The Debtors have not made any prior motion for the relief sought in this Supplement to this or any other court.

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<sup>3</sup> The "Other Interested Parties" include the following: (i) counsel to certain of the insurers and trustees of the bonds issued or guaranteed by the Debtors; and (ii) counsel to certain ad hoc groups of holders of bonds issued or guaranteed by the Debtors.

**WHEREFORE**, the Debtors respectfully request entry of the Proposed Order in the form attached hereto as **Exhibit A**, retroactively approving the modifications of the Title III Stay set forth on Exhibit 1 and 2 to the Proposed Order, and granting such other and further relief as the Court may deem proper.

Dated: May 1, 2018  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock (admitted *pro hac vice*)  
Brian S. Rosen (admitted *pro hac vice*)  
Paul V. Possinger (admitted *pro hac vice*)  
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*Attorneys for the Financial Oversight  
and Management Board as Representative  
for the Debtors*

/s/ Hermann D. Bauer

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*Co-Attorneys for the Financial Oversight  
and Management Board as Representative  
for the Debtors*

**Exhibit A**

Proposed Order

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. \_\_\_\_\_

**ORDER SUPPLEMENTING THIRD OMNIBUS ORDER GRANTING  
RELIEF FROM THE AUTOMATIC STAY**

Upon the *Debtors' Supplement to Third Omnibus Motion Seeking Approval of Stipulations Modifying the Automatic Stay* (the "Supplement");<sup>2</sup> and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Supplement is in the best interests of the Debtors, their creditors, and other parties in interest; and the Court having found that the Debtors provided adequate and appropriate notice of the Supplement under the circumstances and that no other or further notice is required; and the Court having reviewed the Supplement; and the Court having determined that the legal and factual bases set forth in the Supplement establish just cause for the

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Supplement.

relief granted herein; and any objections to the relief requested herein having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is

**HEREBY ORDERED THAT:**

1. The relief requested in the Supplement is granted as set forth herein.
2. Pursuant to Bankruptcy Code sections 362(d)(1) and 105(a), made applicable to the Title III cases by PROMESA section 301(a), the Title III Stay is modified as set forth in the attached Exhibit 1 for the matter subject to prior stipulations between the Commonwealth and the counterparties, *nunc pro tunc* to the dates specified therein.
3. Pursuant to Bankruptcy Code sections 362(d)(1) and 105(a), the Title III Stay is modified as set forth in the attached Exhibit 2 for administrative employment and pension matters against ERS, *nunc pro tunc* to April 20, 2018 (the date of the Third Omnibus Motion).
4. All rights, defenses, and protections of each of the Debtors with respect to any matters pending or that may arise in their respective Title III Cases, including the treatment of any claim arising from the matters set forth on Exhibits 1 and 2 hereof under a plan of adjustment or otherwise in the Title III Case are hereby reserved. Nothing in this Order or the Debtors' consent to stay modification as set forth in the Motion shall be deemed to be, or construed as, (a) an admission by any party of any liability, wrongdoing, act, or matter or that any claim or defense has or lacks merit; (b) a waiver of the Debtors' rights to dispute, contest, setoff, or recoup any claim, including any claims asserted in the subject actions, or assert any related rights, claims, or defenses and all such rights are reserved; or (c) an approval or assumption of any agreement or contract between the parties under Bankruptcy Code section 365.
5. Notwithstanding any applicability of any Federal Rule of Bankruptcy Procedure, the terms and conditions of this Order shall be immediately effective and enforceable



upon its entry.

6. The Court shall retain jurisdiction to hear and determine all matters  
(a) arising from or related to the implementation, enforcement, or interpretation of this Order and  
(b) concerning the execution or enforcement in the Title III cases of any judgment entered in a  
prepetition ordinary course civil action where the Debtors agreed to modify or lift the Title III  
Stay to allow the action to proceed to judgment by the underlying court.

Dated: \_\_\_\_\_

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

**Exhibit 1**

Parties and Actions Granted Modification of the Title III Stay

**TITLE III STAY MODIFICATIONS AGREED TO BY THE DEBTORS  
FROM FEBRUARY 21, 2018 THROUGH APRIL 20, 2018**

	<b>Case Information</b>	<b>Movant(s)</b>	<b>Debtor</b>	<b>Brief Description of the Modification</b>	<b>Stipulation Date</b>
1.	<i>Caraballo-Rivera, et al. v. García Padilla, et al., Case No. 14-1431</i>  United States District Court for the District of Puerto Rico  Discrimination action	Héctor M. Vázquez-García, Doroteo Sánchez-Cruz, Daniel Valentín García, Carlos J. Pacheco-Estrada, Luis A. Pérez-Bernard, and Roberto Vélez-García	Commonwealth	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the District Court; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against the Commonwealth or any other Title III Debtor.	April 19, 2018

**Exhibit 2**

ERS Administrative Actions Granted Modification of the Title III Stay

**TITLE III STAY MODIFICATIONS AGREED TO BY DEBTOR ERS**  
**FROM FEBRUARY 21, 2018 THROUGH APRIL 20, 2018**

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
1	2016-0148	Reimbursement of contributions	Aida Rosario Ramos	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
2	2016-0087	Reinstatement	Angel A. Quiñones	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
3	2016-0198	Readjustment of pension	Confesor Calderón Molina	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
4	2016-0349	Disability	Edilia Rivera Flores	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
5	2015-0272	Disability	Eliud Rivera Zambrana	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
6	2015-0052	Reimbursement of contributions	Emma I. Colón Centeno	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
7	2016-0149	Reimbursement of contributions	Giselle Rodríguez Figueroa	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
8	2016-0061	Disability	Héctor González Martínez	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
9	2015-0066	Deferred pension	Hipólito Ortiz Figueroa	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
10	2016-0025	Disability	Iris M. Rodríguez Rodríguez	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
11	2014-0413	Disability	José Rodríguez Román	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
12	2014-0365	Disability	Julio Pérez Ortiz	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018



	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
13	2016-0097	Disability	Lesvia Boria Escobar	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
14	20160067	Disability	LESVIA BORIA ESCOBAR	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
15	2015-0167	Disability	Lydia Velázquez Feliciano	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
16	2015-0290	Disability	Maritza Cortés Pagán	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
17	2016-0218	Disability	Marybel Ramos Hndez	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
18	2015-0323	Disability	Melvin D. Faria Méndez	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
19	2016-0152	Reinstatement	Norma I. Calo Calo	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
20	2016-0030	Disability	Norma V. Rodríguez Lugo	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
21	2015-0258	Disability	Orlando Pabón Del Río	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
22	2016-0038	Disability	Otilia Quirindongo Vega	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
23	2015-0003	Disability	Pablo Laboy Laboy	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
24	2016-0209	Reimbursement of contributions	Rafael Valle Ortiz	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
25	2016-0227	Disability	Rene Solis Roldán	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
26	2016-0144	Disability	Rosa M. Santoni López	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
27	2016-0187	Disability	Sonia Y. Cortés González	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
28	2016-0110	Disability	Teresa Reyes López	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
29	2016-0242	Disability	Yadira E. Torres Nieves	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
30	KLRA 2016 00908	Appeal from administrative determination on employee benefits	Luz Melba Lopez Ortiz	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018

	<u>Case Number</u>	<u>Matter</u>	<u>Movant(s)</u>	<u>Debtor</u>	<u>Brief Description of the Modification</u>	<u>Stipulation Date</u>
31	KLRA 2017 00481	Appeal from administrative determination on employee benefits	Marta Carrasquillo Rivera	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018
32	2016-0197	Disability	Zahira Rodríguez Soler	ERS	The Title III Stay is hereby modified solely to the limited extent necessary to allow the Prepetition Action to proceed to judgment before the Prepetition Forum; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to, the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against ERS or any other Title III Debtor	4/20/2018